

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

March 6, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs write to request a modest extension of time and expansion of page limit for Plaintiffs' surreply in response to Saudi Arabia's filings of March 4, 2024, in support of its motion to dismiss. ECF Nos. 9610-9611. Saudi Arabia's filings accompanying its 60-page reply brief comprise over 130 new exhibits, including its "Response to Plaintiffs' Averment" (KSA Ex. 160) of 1,868 single-spaced pages. Plaintiffs respectfully request that the schedule set by the Court at ECF No. 9520 be amended to grant Plaintiffs an extension of three weeks, until April 15, 2024, and an expansion of the page limit for their surreply brief, from 20 pages to 30 pages.

Saudi Arabia has advised that it would agree to two weeks' additional time on grounds of "professional courtesy," but that it opposes Plaintiffs' requests for an extension of any longer than two weeks, or any additional pages. Plaintiffs respectfully submit that only two weeks would be inadequate in light of: *first*, the burden of cross-checking and responding to Saudi Arabia's filings that total over 2,000 pages in length (significantly longer than Plaintiffs' own main opposition papers); *second*, a fair balancing of Plaintiffs' extension with the extension granted to Saudi Arabia in January 2024 (to which Plaintiffs consented immediately); and *third*, the Easter holiday, which impacts the schedule and availability of a number of Plaintiffs' counsel at the end of this month. The same rationale supports an extension of the page limit.

Accordingly, Plaintiffs respectfully request that the Court grant Plaintiffs an extension until April 15, 2024, along with a revised 30-page limit for their surreply brief.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haeefe

The Honorable Sarah Netburn

March 6, 2024

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF